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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

TWIN FLAMES UNIVERSE.COM INC., a
Michigan corporation; MIND ALIGNMENT
PROCESS INC., a Michigan corporation;
JEFFREY AYAN, an individual resident of
Michigan; and SHALEIA AYAN, an individual
resident of Michigan,

Plaintiffs,

vs.

LISA ELLE GIACOMINI, et al.,

Defendants.

Case No.: 2:20-cv-11659-GAD

**REPLY TO COUNTERCLAIMS
BY ADAM KATSALE a/k/a ADAM
NAMASTE d/b/a ASCENSION
EXPRESS**

Plaintiffs TWIN FLAMES UNIVERSE.COM INC. (“TFU” or “Twin Flames Universe”);
JEFFREY AYAN, (“Mr. Ayan”); and SHALEIA AYAN, (“Ms. Ayan” and collectively with TFU,
and Mr. Ayan, “Plaintiffs”), for their reply and affirmative defenses to the “counterclaim” asserted

by ADAM KATSALE a/k/a ADAM NAMASTE d/b/a ASCENSION EXPRESS (“Katsale” or “Ascension Express”) state and allege as follows:

D. Asserting Claims Against the Plaintiff (Counterclaim) or Against Another Defendant (Cross-Claim) (if applicable)

3. No response is required. To the extent a response is deemed necessary denied.
 - a. No response is required. To the extent a response is deemed necessary, denied.
 - b. No response is required. To the extent a response is deemed necessary, denied.

With respect to Katsale’s prayer for relief, no response is required. To the extent a response is deemed necessary, Plaintiffs deny the allegations contained after paragraph 3(b) clause and further avers that Katsale is not entitled to the requested relief or any relief whatsoever from Plaintiffs.

AFFIRMATIVE DEFENSES

1. Katsale’s counterclaim fails to state a claim upon which relief can be granted.
2. Katsale’s counterclaim is barred by unclean hands.
3. Katsale’s counterclaim is barred, in whole or in part, by the doctrines of acquiescence, waiver, release, consent, ratification, estoppel and excuse.
4. Katsale has not suffered any compensable damages as a result of Plaintiff’s actions.
5. Katsale’s damages, if any, were not proximately caused by Plaintiff.
6. Katsale’s damages, if any, were caused in whole or in part by Katsale’s own acts, omissions, and/or negligent conduct.

7. To the extent that Katsale suffered any damages, Katsale failed to mitigate such damages.

8. Plaintiffs raise each and every defense available to it under the applicable laws of the State of Michigan. Plaintiffs reserve the right to raise additional defenses.

CONCLUSION

WHEREFORE, Plaintiffs respectfully request that the Court enter judgment dismissing the Katsale's counterclaim, with prejudice, and awarding Plaintiffs costs and such other relief as the Court may deem appropriate.

DATED this 2nd day of October, 2020.

Respectfully submitted,

/s/ Matthew Kerry
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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2020, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the District of Michigan by using the CM/ECF system, and counsel of record are registered as ECF Filers and that they will be served by the CM/ECF system.

/s/ Matthew Kerry